## Before the Federal Communications Commission Washington, DC 20554

In the Matter of:	) .	
	)	
Implementing Public Safety Broadband Provisions of the Middle Class Tax Relief and Job Creation Act of 2012	)	PS Docket No. 12-94
Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band	) )	PS Docket No. 06-229
Service Rules for the 698-746, 747-762 and 777- 792 MHz Bands	)	WT Docket No. 06-150

The Illinois Secretary of State Police respectfully submits these comments in support of the detailed response to the Commission's Notice of Proposed Rulemaking in the above-captioned proceeding<sup>1</sup> from the State of Illinois, Illinois State Police. These Comments focus on the issue of the relocation of 700 MHz Narrowband Systems licensees that remain in what has been redesignated as broadband public safety spectrum. Illinois, one of the licensees to which this relocation would apply, urges the Commission, in consultation with FirstNet, to provide a definitive source of funding and a rationale process to implement the relocation. The State of Illinois deployed its 700 Narrowband system under valid authority from the Commission and should not be required to bear the cost of the relocation. In addition to sufficient funding, the State of Illinois and other public safety licensees facing

<sup>&</sup>lt;sup>1</sup> Notice of Proposed Rulemaking, PS Docket No. 12-94, PS Docket No. 06-229 and WT Docket No. 06-150, released March 8, 2013

relocation will need a process that recognizes the real work needed to complete the relocation process. Finally, that process must not compromise our public safety operations during or after relocation implementation.

The Illinois Secretary of State Police appreciates the opportunity to provide its comments of support for the official detailed response prepared by the Illinois State Police, on behalf of the State of Illinois, to this Notice of Proposed Rulemaking. The Illinois Secretary of State Police alongside all our Public Safety agencies believe that a step towards national compliance and a complete organized band plan can be achieved if the Commission, FirstNet, and NTIA jointly agree and decide that relocation costs are an eligible expense under the deployment funding provided to FirstNet by Congress.

Respectfully Submitted,

Brad G. Demuzio

Director

Illinois Secretary of State Police